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16 Attorneys for Defendant

17 **UNITED STATES DISTRICT COURT**
18 **NORTHERN DISTRICT OF CALIFORNIA**
19 **SAN JOSE DIVISION**

20 BROOKE McLAUGHLIN,) **No. C-04-0960 RS**
21 Plaintiff,)
22 v.) **STIPULATION TO CONTINUE CERTAIN**
23 UNITED STATES OF AMERICA,) **PRETRIAL DEADLINES, AND**
24 Defendant.) **[PROPOSED] ORDER**
25 _____)

26 IT IS HEREBY STIPULATED AND AGREED by and between the parties, by and through their
27 respective undersigned attorneys, as follows:

28 Prior to the previous deadline for disclosure of experts, plaintiff's counsel contacted defendant's
counsel to ask for an extension of time for completion of an expert report. Plaintiff's counsel offered to
likewise extend defendant's deadline. Defendant's counsel agreed. The extension for defendant's expert
disclosure is longer than plaintiff's due to defendant's counsel's upcoming prepaid vacation. Other
deadlines were extended accordingly, but this request for extended deadlines does not impact the dates for
filing pretrial statements, the pretrial conference, or the trial of this case.

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1 Accordingly, the parties request the following changes to the pretrial schedule:

2 Event	3 Previous Date	4 Requested Date
Plaintiff's Expert Disclosure and Reports re liability	June 9, 2006	June 23, 2006
Defendant's Expert Disclosure and Reports re liability	June 23, 2006	July 18, 2006
Completion of all fact and expert discover re liability	August 4, 2006	August 18, 2006
Last day to hear dispositive motions	September 20, 2006	September 27, 2006

7 IT IS SO STIPULATED.

8 Respectfully submitted,

9 THE CARTWRIGHT LAW FIRM, INC.

KEVIN V. RYAN
United States Attorney

11 /s/ Gary Loftis (for)
12 Robert E. Cartwright, Jr.

11 /s/ Claire T. Cormier
12 Claire T. Cormier
Assistant United States Attorney

13 Dated: June 15 , 2006

13 Dated: June 15, 2006

17 O R D E R

18 PURSUANT TO STIPULATION AND GOOD CAUSE APPEARING, IT IS SO ORDERED.

20 Date: 6/15/06



21 Hon. RICHARD SEEBORG
22 United States Magistrate Judge